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Office of General Counsel

Abbott Laboratories  
One Abbott Park Road  
Abbott Park, Illinois 60064-3500Telephone: (708) 937-5208  
Facsimile: (708) 938-6235

April 28, 1992

VIA FEDERAL EXPRESS

Mr. Thomas Williams  
Remedial Project Manager  
Superfund WI/MI Remedial Response Branch  
U.S. Environmental Protection Agency  
230 South Dearborn Street (5HSRW-6J)  
Chicago, Illinois 60604

RE: Organic-Williams

Dear Mr. Williams:

This letter responds to the United States Environmental Protection Agency's Request for Information (the "Request") which was received by Abbott Laboratories ("Abbott") on March 17, 1992. Abbott hereby responds as follows:

REQUEST NO. 1: The following USEPA identification numbers have been issued to Abbott's facilities:

<u>DIVISION/LOCATION</u>	<u>USEPA ID NUMBER</u>
ROSS/ALTAVISTA	VAD066022096
ROSS/CASA GRANDE	AZD981399892
ROSS/COLUMBUS	OHD004283115
ROSS/STURGIS	MID005174339
HPD/ASHLAND	OHD003937257
HPD/AUSTIN	TXD012660999
HPD/BUFFALO	NYD012660999
HPD/LAURINBURG	NCD050411800
HPD/MOUNTAIN VIEW	CAD981977903
HPD/ROCKY MOUNT	NCD900733180
HPD/SALT LAKE CITY	UTD63329569
ADD/DALLAS	TXD981596436

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BARCELONETA, PR  
NORTH CHICAGO  
ABBOTT PARK

PRD090131251  
ILD055409940  
ILD980795561

REQUEST NO. 2: Abbott objects to Request No. 2 which requires Abbott to identify "all persons having knowledge or information about the generation, transportation, treatment or disposal or other handling of hazardous materials at your place of business" on several grounds. First, this Request does not specify any time frame within which the information is sought. Without any guidance as to the relevant time period, it is impossible to list "all persons" having knowledge of the above-referenced information. Secondly, the phrase "your place of business" is not defined. Abbott operates over 15 plants/facilities in the United States and Puerto Rico. Thus, assuming for purposes of this response that USEPA seeks information on each of Abbott's domestic facilities, Abbott will provide the requested information for individuals with current knowledge and primary responsibility for overseeing its generation, transportation, treatment or disposal practices at each of its domestic facilities and its Puerto Rico operations. Those individuals are as follows:

Chuck Classen, Abbott Laboratories, North Chicago, IL  
Plant Environmental Co-ordinator

Herb Cheek, Abbott Laboratories, Buffalo, New York  
Plant Environmental Co-ordinator

Curt Contreras, Abbott Laboratories, Bothell, WA  
Plant Environmental Co-ordinator

Dave Echols, Abbott Laboratories, Salt Lake City, UT  
Plant Environmental Co-ordinator

Tom Clark, Abbott Laboratories, Abbott Park, IL  
Safety Co-ordinator, APS

John Knubbe, Abbott Laboratories, Abbott Park, IL  
Corporate Environmental Services

Jose L. Carrasquillo, Abbott Laboratories, Ponce, Puerto Rico  
Plant Environmental Co-ordinator

Brian Ford, Abbott Laboratories, Abbott Omni-Flow,  
Wilmington, MA  
Plant Environmental Co-ordinator

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Tim Hain, Abbott Laboratories, Mountainview, CA  
Plant Environmental Co-ordinator

Jim Malone, Abbott Laboratories, Ashland Ohio  
Plant Environmental Co-ordinator

Mike Redman, Abbott Laboratories, Rocky Mount, NC  
Plant Environmental Co-ordinator

Grant Oxendine, Abbott Laboratories, Laurinburg, NC  
Plant Environmental Co-ordinator

Mary Stagner, Abbott AAIS, San Diego, CA  
Plant Environmental Co-ordinator

John Robbins, Abbott Laboratories, Abbott Park, IL  
Environmental Co-ordinator  
Abbott Hospital Products Division

Jim Moomey, Abbott Laboratories, Abbott Park, IL  
Environmental Co-ordinator  
Abbott Pharmaceutical Products Division

Sanford White, Abbott Laboratories, Abbott Park, IL  
Environmental Co-ordinator  
Abbott Diagnostics Division

Alan Moran, Ross Laboratories, Division Abbott Laboratories,  
Columbus Ohio  
Environmental Co-ordinator

Jim McClain, Abbott Laboratories, North Chicago, IL  
Environmental Co-ordinator  
Chemical and Agricultural Products Division

Luis Rivera, Abbott Laboratories, Barceloneta PR,  
Environmental Co-ordinator

Lorraine Louis, Abbott Laboratories, Barceloneta PR,  
Purchasing Manager

REQUEST NO. 3: Abbott states in response to Request No. 3 that its accounts payable department assigned a vendor identification number, V089648, to an entity entitled Organic Chemicals, Inc., 3291 Chicago Drive, P.O. Box 131, Grandville, Michigan in 1978. This vendor identification information is kept on a yearly basis, so Abbott is unable to provide more specific dates. Further, the vendor identification number is not associated with a particular plant or facility. Abbott's accounts payable department has not retained copies of

information relating to the details of any purported transactions with this entity. A vendor identification number is typically assigned to any entity with which Abbott is considering entering into a business relationship. Thus, the vendor identification number is not evidence of actual transactions with that entity. Further, Abbott's corporate purchasing department does not have any records of any payments made to the above-named entity. With respect to the sub-parts of Request No. 3, Abbott incorporates this response to each of these particular requests and further states:

REQUEST NO. 3(a): No information.

REQUEST NO. 3(b): No information.

REQUEST NO. 3(c): No information.

REQUEST NO. 3(d): No information.

REQUEST NO. 3(e): No information.

REQUEST NO. 3(f): No information.

REQUEST NO. 3(g): No information.

REQUEST NO. 3(h): No information.

REQUEST NO. 3(i): No information.

REQUEST NO. 4: Abbott hereby incorporates its general response to Request No. 3 above in response to this Request and further states it has no additional information pertaining to this Request.

REQUEST NO. 5: Abbott hereby incorporates its general response to Request No. 3 above in response to this Request and further states it has no additional information pertaining to this Request.

REQUEST NO. 6: Abbott hereby incorporates its general response to Request No. 3 above in response to this Request and further states it has no additional information pertaining to this Request and each of its various sub-parts.

REQUEST NO. 7: Not applicable/No information.

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REQUEST NO. 8: Abbott states in response to this Request that based upon its response to Request No. 3 herein, this Request is not applicable.

REQUEST NO. 9: Not applicable.

REQUEST NO. 10: Not applicable.

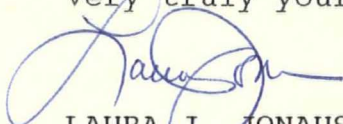
REQUEST NO. 11: Not applicable.

REQUEST NO. 12: Abbott hereby incorporates its response to Request No. 2 herein in response to this Request.

REQUEST NO. 13: Abbott does not have any documents pertaining to this Request. Abbott does have on microfilm certain vendor lists, on a yearly basis, which lists include the name and address of Organic Chemicals, Inc. Abbott will provide a copy of said microfilm.

REQUEST NO. 14: No information.

Very truly yours,



LAURA J. JONAUS  
Attorney


LJJ:mjz

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF LAKE )

VERIFICATION

I, LAURA J. JONAUS, having been duly sworn on oath, depose and state as follows:

1. I am an attorney in the Office of General Counsel of ABBOTT LABORATORIES, an Illinois corporation.
2. I hereby state that after first conducting a reasonably prudent search, I am responding to the Information Request to the best of my knowledge and belief by furnishing the answers herein.
3. Many of the facts set forth in the answers are not within my personal knowledge but have been gathered and compiled at my direction by others within the employ of Abbott Laboratories. Based upon the information provided to me, I believe these facts to be true.

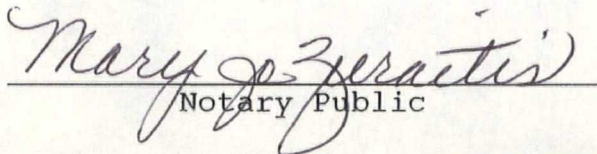


\_\_\_\_\_  
LAURA J. JONAUS

(708) 937-5208

\_\_\_\_\_  
Business Phone Number

Subscribed and Sworn to before  
me this 28th day of April, 1992.

  
\_\_\_\_\_  
Notary Public

Organic-Williams

